

Widespread Economic Impact Analysis for Montana Facilities: Sun Prairie

Draft

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1. Introduction

According to EPA's Interim Economic Guidance for Water Quality Standards (U.S. EPA, 1995), if financial tests demonstrate that pollution control expenditures would have substantial adverse economic impacts, the next step is to determine whether there would also be widespread economic impacts to the community or surrounding area. U.S. EPA (1995) does not provide specific standardized tests to determine whether impacts would be widespread; instead, it provides guidance on how to evaluate the magnitude of expected changes to indicators such as increased employment, losses to the local economy, changes in household income, decreases in tax revenues, indirect effects on other businesses, and increased sewer fees to remaining private entities. At a minimum, the analysis must define the affected community (the geographic area where project costs pass through to the local economy), consider the baseline economic health of the community, and evaluate how the proposed project will affect the socio-economic well-being of the community.

The Montana Department of Environmental Quality (Montana DEQ) has developed a set of descriptive and criteria questions designed to evaluate the potential for widespread impacts.¹ Appendix A provides the full list of questions as well as guidance provided by Montana DEQ in how to collect and interpret appropriate data.

In a previous analysis,² Abt Associates determined that Sun Prairie Village could experience substantial economic impacts as a result of meeting applicable numeric nutrient criteria. Based on Montana DEQ's widespread test, this document provides the results of a preliminary analysis to determine whether, if the impacts are substantial, they could also be widespread. Each subsection corresponds to a question in Montana DEQ's test.

¹ PublicEntity_Worksheet_EPACostmodel_2016.

² Analysis dated June 30, 2016.

2. Descriptive Questions

2.1 Definition of Geographic Area

The Sun Prairie Village Wastewater Treatment Facility (WWTF) is operated by the Sun Prairie Village County Water and Sewer District (District) and serves 510 households and 4 commercial users (including 2 bars, a gas station, and a shop) in Cascade County. The community is within the metropolitan area of Great Falls, Montana.

For this analysis, EPA assumed that the affected community is service area of the District, which is part of the Sun Prairie Census-Designated Place (Sun Prairie CDP). Sun Prairie CDP has a population of approximately 1,290 residents (based on U.S. Census Bureau, 2014a). Since the WWTF likely does not serve any large industrial or commercial customers that provide employment, goods, or services to surrounding communities, we assume that the impacts of increased costs will not extend beyond the households (and four small businesses) served by the facility.

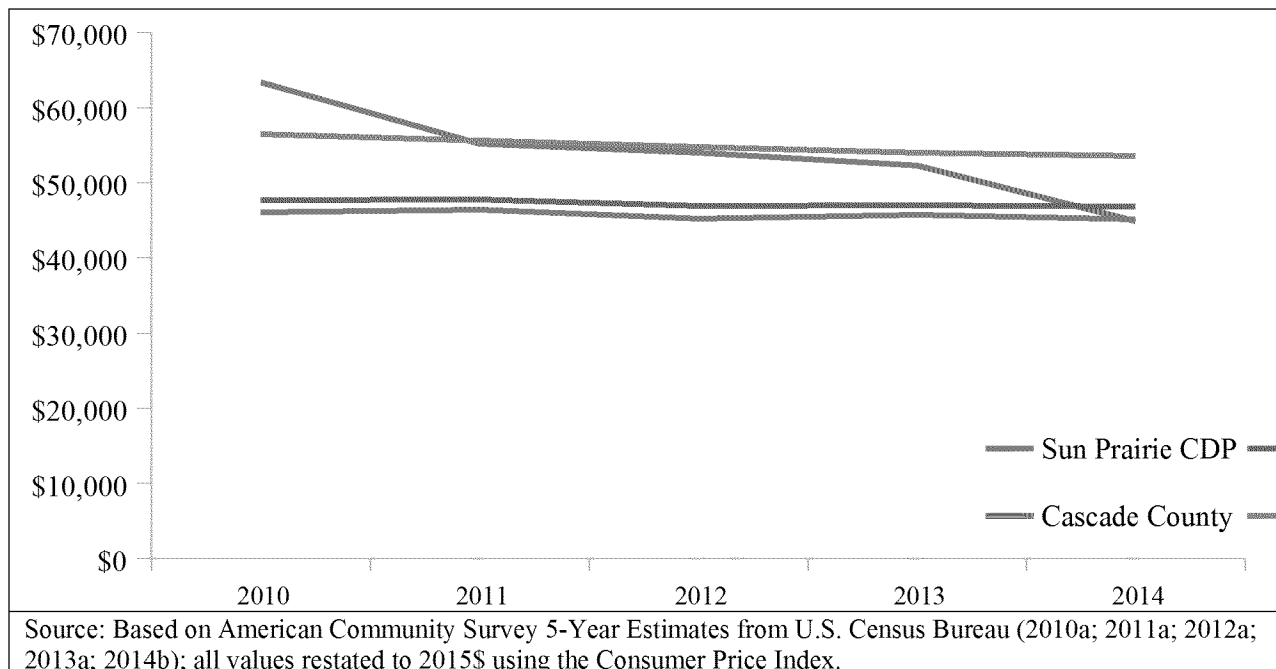
The District provides water and wastewater services to households within the District, funded by user fees (District, 2015). The District's boundaries may not correspond exactly to the boundaries of the Sun Prairie CDP; it is possible that some households within the Sun Prairie CDP are not served by the District, and/or that there are some households served by the District that are not within the Sun Prairie CDP. In such cases, the economic baseline for the Sun Prairie CDP may not represent the community that would be affected by the costs of the project. However, it is likely that the majority of the affected community is within the Sun Prairie CDP and as such, we assume that the economic baseline for the Sun Prairie CDP (as described in subsequent sections) represents the baseline for the affected community.

2.2 Description of General Economic Trends

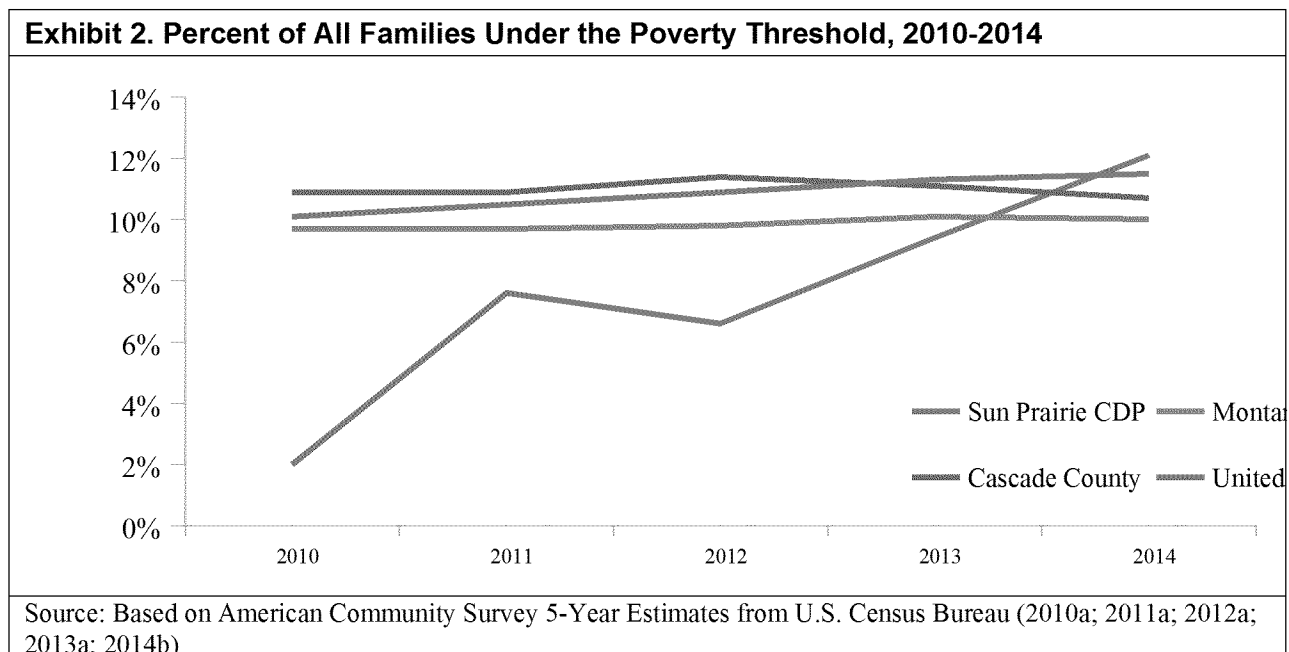
According to data from the U.S. Census Bureau's American Community Survey (ACS),³ the Sun Prairie CDP has a slightly lower median household income (MHI) than the state, at \$44,844 compared with \$46,766 during the same time period (U.S. Census Bureau, 2014b). Exhibit 1 shows the MHI trends for the Sun Prairie CDP and the state compare with the United States between 2010 and 2014, with all dollar values adjusted to 2015\$ using the Consumer Price Index (CPI). Over that time period, MHI in Sun Prairie decreased by 29%, falling below the state and national medians (which declined by 2% and 5%, respectively, over the same period).

Exhibit 1. Median Household Income, 2010-2014
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³ For this analysis, all data from ACS represent 5-year estimates, which are available for all places and represent the most precise data available. These data are interpreted as being representative of 60 months of collected data; for example, 2014 data represents the data from January 1, 2010 and December 31, 2014. For more information, see U.S. Census Bureau (2016d).



The poverty rate in Sun Prairie (12.1%) is higher than the United States (11.5%), Montana (10.0%), and Cascade County (10.7%). ACS data show a much steeper increase for the Sun Prairie CDP relative to the national, state, and county trends across the 2010 to 2014 data releases. Exhibit 2 shows these trends.



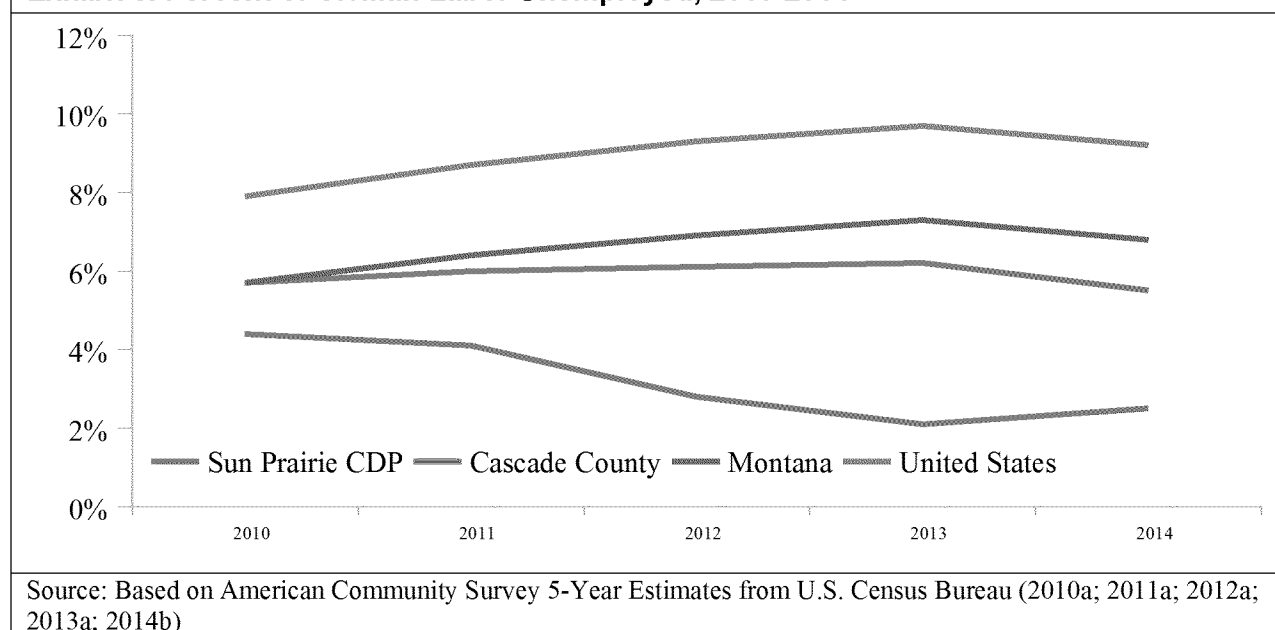
The unemployment rate in Cascade County was 4.1% in June 2016 (U.S. Bureau of Labor Statistics (BLS), 2016b), which is slightly lower than the state rate of 4.2% (BLS, 2016c) and lower than the national rate of 4.9% (BLS, 2016d). However, note that BLS data on unemployment is not available at the

community level, but rather at the county level. The unemployment rate in Cascade County may not be representative of more local conditions in Sun Prairie.

ACS data shows that the long-range trend is a lower unemployment rate in Sun Prairie CDP compared with county, state, and national rates. See Exhibit 3. The most recent ACS data indicates a Sun Prairie unemployment rate of 2.5% compared with 5.5% in Cascade County (U.S. Census Bureau, 2014b).

The decrease in unemployment experienced by Sun Prairie residents coupled with the decreased MHI and increased poverty rate suggests that wages may be declining locally.

Exhibit 3. Percent of Civilian Labor Unemployed, 2010-2014

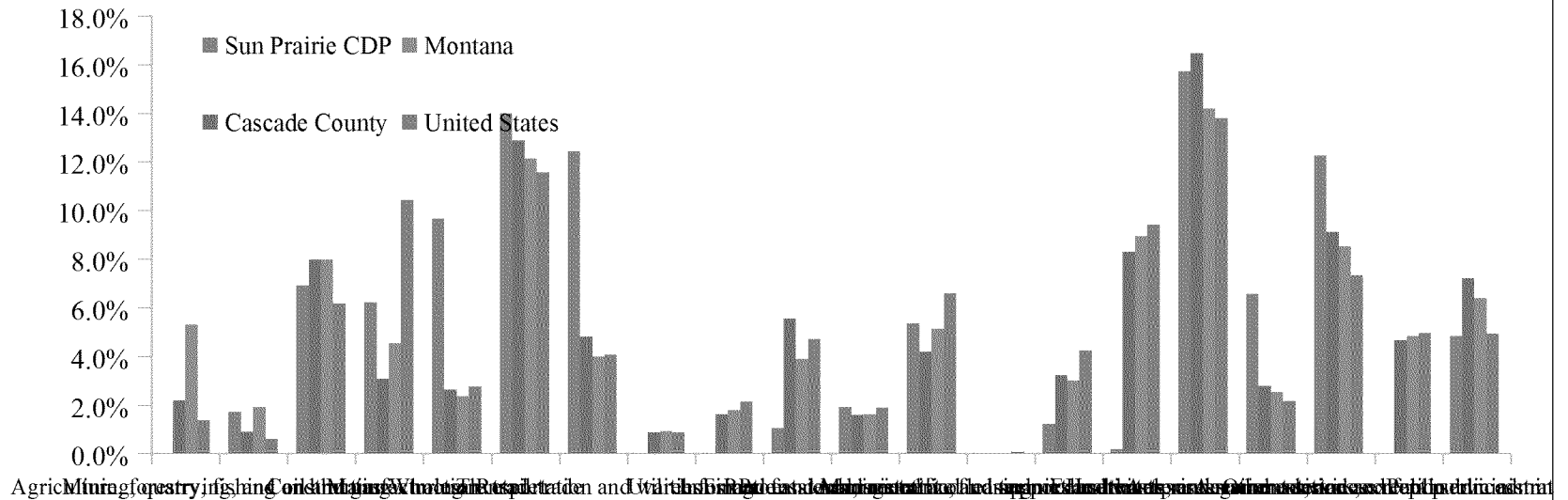


2.3 Description of Industry Status and Trends

The Census Bureau's ACS provides some information about the industries providing employment in the Sun Prairie CDP, as well as at the county, state, and national levels, which is summarized in Exhibit 4. As shown in the exhibit, the Sun Prairie CDP has a higher share of employment in transportation/warehousing (12.4%) and wholesale trade (9.7%) relative to the county, state, and national levels (which range from 4.0% to 4.8% for transportation/warehousing and from 2.4% to 2.7% in wholesale trade). The retail trade, health care/social assistance, and accommodation/food service industries also make up large shares of local employment (14.0%, 15.7%, and 12.3%, respectively).

Since there are only 4 businesses served by the wastewater treatment facility, we assume that the majority of residents are employed outside the service area of the WWTF.

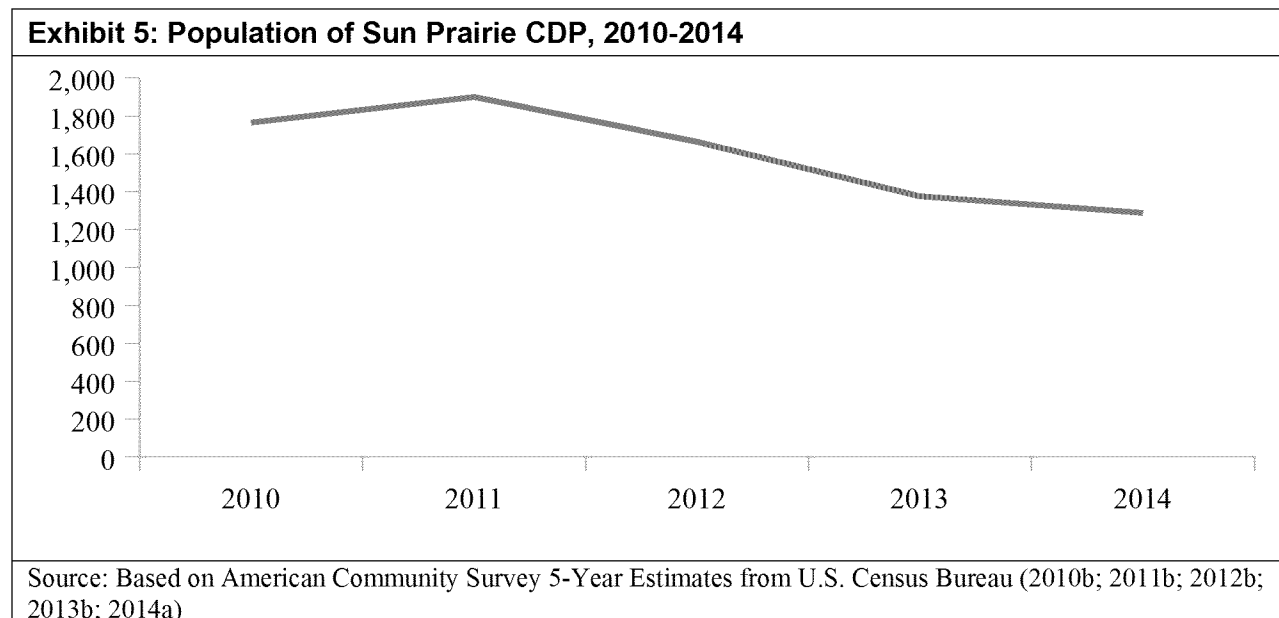
Exhibit 4. Employment by Industry



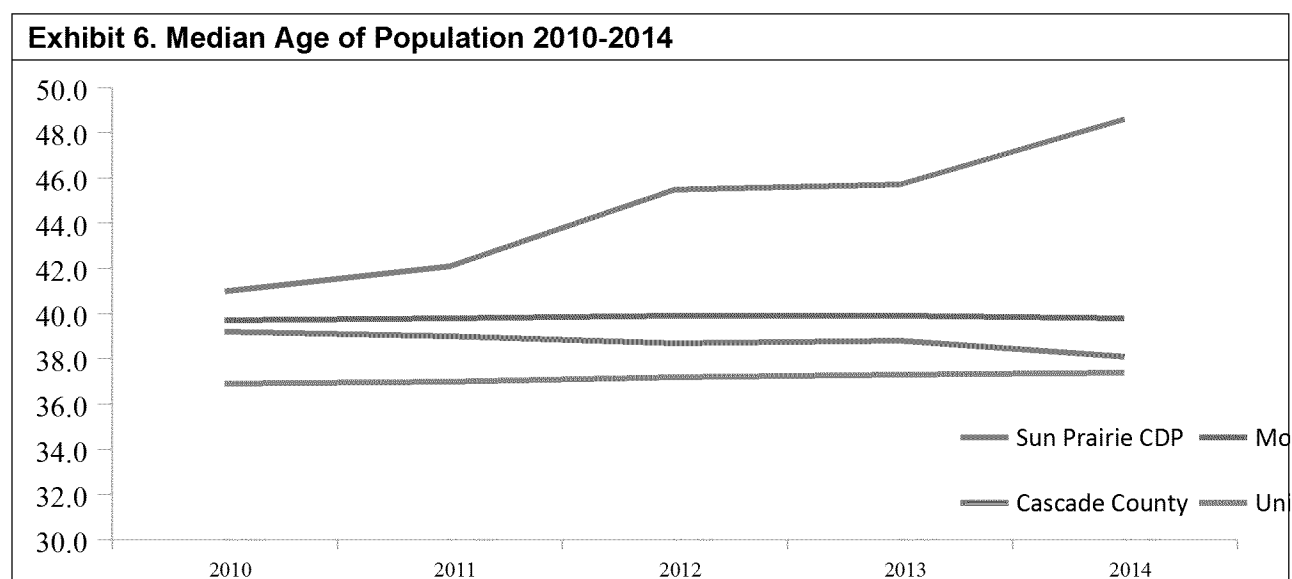
Source: Based on American Community Survey 5-Year Estimates from U.S. Census Bureau (2014c)

2.4 Description of Population Trend

According to 2014 ACS data (U.S. Census Bureau, 2014a), the Sun Prairie CDP has a population of 1,290, which reflects a decrease over the prior 5 years. Exhibit 5 shows the ACS population trend between the 2010 and 2014 data releases.



The median age in the Sun Prairie CDP has increased over the same period and is higher than the state and national average. Exhibit 6 shows the median age in the Sun Prairie CDP, county, state, and nation over the 2010 through 2014 ACS data releases. In the 2014 data release, the median age in Sun Prairie was 48.6 compared with 39.8 in the state. According to ACS, 23.8% of households in Sun Prairie have retirement income, compared with 17.9% at the state level and 17.8% nationally.



Source: Based on American Community Survey 5-Year Estimates from U.S. Census Bureau (2010b; 2011b; 2012b; 2013b; 2014a)

The 2014 ACS reports that approximately 13% of adult Sun Prairie residents have attained Bachelor's degrees or higher, compared with 29% at the state and national levels (see Exhibit 7). About 84% of Sun Prairie residents (25 years and over) have attained a high school diploma or higher, compared with 92% at the state level and 86% at the national level (U.S. Census Bureau, 2014c).

Exhibit 7: Educational Attainment			
Education Level (population 25 years and over)	Sun Prairie CDP	Montana	United States
Less than 9th grade	4.6%	2.2%	5.8%
9th to 12th grade, no diploma	11.6%	5.3%	7.8%
High school graduate (includes equivalency)	35%	29.8%	28.0%
Some college, no degree	17.9%	25.3%	21.2%
Associate's degree	18%	8.3%	7.9%
Bachelor's degree	11.3%	19.8%	18.3%
Graduate or professional degree	1.5%	9.2%	11.0%
Source: Based on American Community Survey 5-Year Estimates from United States Census Bureau (2014d)			

3. Criteria Questions

3.1 General Economic Impacts

According to the General Manager of the District (Decker, 2015), the existing annual household costs are \$323, and we previously estimated that the pollution control project would increase the costs by \$408, for a total annual cost per-household of \$731. This represents a monthly increase of approximately \$34 per household. Total wastewater costs per household would represent 1.4% of MHI (see the substantial impacts analysis).

In the evaluation of substantial impacts, we estimated that households bear 98.45% of baseline costs and would bear the same portion of project costs, or \$208,209 out of a total annual project cost of \$211,483. The four non-household customers of the wastewater system (2 bars, a gas station, and a shop) would bear the remaining annual project costs of \$3,274 in addition to existing costs of \$2,588 (for a total of \$5,862).

The potential for the pollution control costs to impact development potential is described further under Section 3.3.

3.2 Employment Impacts

As noted under Section 2.1, the WWTF primarily serves residential customers, with only 4 non-residential contributors – 2 bars, a gas station, and a shop. These 4 businesses will incur some cost increases as a result of the pollution control project, but are not likely to represent a large share of employment of Sun Prairie residents. For the purpose of this analysis, we assume that the majority of Sun Prairie residents are employed outside the sewer district, and that employment will not be meaningfully impacted by the pollution control expenditures.

3.3 Development Impacts

Baseline average household wastewater rates in the District are \$27 per month (Decker, 2015), while the average monthly wastewater rate for communities with a population between 500 and 7,500 is \$36.27 (Rural Community Assistance Corporation, 2014). As such, the District's existing wastewater rate is lower than others of comparable communities within the state. Monthly rates in other communities within the Great Falls metropolitan area are comparable to or higher than Sun Prairie's (including Cascade [\$47], Vaughn [\$32], and Black Eagle [\$26]; Montana Rural Assistance Corporation, 2014).

In the substantial impact analysis, we estimated that the monthly household cost would increase by about \$34, which would result in a total rate that is more than double the existing rate. As such, it is possible that the increased wastewater treatment costs may cause some decline in local residential development relative to the baseline scenario (i.e., without the additional costs). Increased wastewater rates could also reduce the community's ability to attract new investments. This impact is more likely if the community's wastewater rates become significantly higher than those in surrounding areas.

However, existing rates in surrounding communities may not be the appropriate basis for comparison to the District's projected wastewater fees (including the pollution control project). Municipalities statewide and nationwide increasingly have to address nutrient impairments through improvements in treatment

controls. Such improvements are expected to continue throughout Montana, increasing wastewater rates for many communities (see Fraser, 2016). For example, the Montana communities of Great Falls, Butte, Stevensville, Livingston, and Whitefish have all made recent upgrades to (or plan to upgrade) their wastewater collection and treatment systems, funded through increased fees (Rowell, 2016; Smith, 2016; Backus, 2016; City of Livingston, 2016; Flathead Beacon, 2016).

If surrounding communities' rates increase in a similar magnitude to those of the District, the potential for adverse development impacts will be mitigated.

3.4 Disposable Income Impacts

With the pollution control project, annual household wastewater expenses in the District would increase from \$323 to \$731 (an increase of 126%). As noted above under Section 3.1, this represents an increase of approximately \$34 per month. This increase may depress local economic activity due to reduced purchasing power by affected residents. The magnitude of these impacts depends on the extent to which higher sewer bills reduce household expenditures on other locally produced goods and services.

The adverse impact to disposable income in the affected community will be exacerbated if outside contractors are used in the design and construction of the needed upgrades, since the additional wastewater revenues collected will be spent outside the community. On the other hand, if the expenditures stay in the community, adverse disposable income impacts could be offset by increased income for local workers and businesses benefitting from construction of new wastewater infrastructure.

3.5 Poverty Level Impacts

According to data from U.S. Census Bureau (2014b), 12.1% of families in Sun Prairie CDP had an income below the poverty level. This represents an increase from 9.4% since the 2013 data release and a higher rate than the county, state, and national levels for the same period (10.7%, 10.0% and 11.5%, respectively). If increased wastewater fees were to result in some local loss of income, this may cause the poverty rate to increase further in the community.

3.6 Multiplier Effects

To the extent that the capital investment and continuing operating and maintenance (O&M) expenditures become revenues to local businesses and employees, there is potential that the increase in user fees will actually result in a net economic benefit through a multiplier effect. Economic multipliers measure the overall effect on direct, indirect, and induced demand caused by a \$1 increase in output for a particular industrial sector. The additional utility costs to install and operate new treatment systems that are spent in the local economy directly increase demand for local goods and services. To meet the increased demand, providers of those goods and services must also increase demand for their inputs, which is an indirect demand impact if they also purchase local inputs. In addition, the revenues and incomes received by local businesses and workers can increase the demand for other local goods and services, which is induced demand because of higher business profits or worker income. The multiplier effect occurs when these direct, indirect, and induced expenditures remain in the local economy, and will be higher in the short-term during the construction phase.⁴ On the other hand, if goods and services are purchased from outside the local economy, the money 'leaks' out and the multiplier effect diminishes.

⁴ The multiplier effects will continue in the longer term at a decreased impact (compared with during construction), as the expenditures associated with operations and maintenance of the new treatment systems continue.

Balanced against the beneficial multiplier benefit of the expenditures on treatment are the corresponding reductions in consumer spending caused by increased sewer fees. That is, the expectation is that an additional household consumer spending requirement for wastewater means reduced spending on everything else, assuming household income does not change. The portion of Sun Prairie households' spending that occurs locally is a key driver of the magnitude of this effect in Sun Prairie itself. Generally speaking, consumer expenditures can have very high leakage rates because expenditures on consumer goods (e.g., groceries or hardware) and services (e.g., financial services) that are not locally produced tend to leave the local economy. If the leakage from the utility expenditures is less than the leakage from consumer expenditures, then theoretically there is a likely net economic benefit, depending on the exact leakage rates and multiplier values for each economic sector. Whether this is the case is unknown, however, because we do not have industrial multipliers specific to the Sun Prairie CDP. Net benefits measured for larger regions (e.g., at the state level) tend to show a net economic benefit. Krop et al. (2008) report the multiplier for the water and sewer industry was 1.799 (i.e., an extra \$1 in water and sewer industry output results in a \$1.79 increase in Montana-wide output), which may be higher than the multiplier on state-wide consumer expenditures. That value was based on 1997 industrial input-output relationships; current relationships likely differ, so the multiplier today will also differ. It is unlikely that Sun Prairie has a multiplier this high, especially if the capital goods and specialty services (e.g., engineering) come from outside the community. In fact, if a large proportion of capital or O&M expenditures leak from the local economy, the multiplier could be less than 1.0.

3.7 Net Debt Impacts

Additional pollution controls would increase the District's annual wastewater treatment costs, from \$167,216 currently to \$378,699 (including annualized capital and recurring O&M costs).

As noted in the substantial impact analysis, the District currently has \$1.7 million in outstanding revenue bonds, which are repaid using service revenues (Decker, 2015), as well as \$41,310 in overlapping debt for Cascade County.

If the District is unable to finance the additional controls via grants, it would need to take on additional debt. As described in the substantial impact analysis, we estimated that the capital costs (including land) of the project would be in the range of \$2.6 million. As such, the total debt for District residents would be in the range of \$4.3 million (including the existing debt burden and estimated project capital costs).

3.8 Water Quality Impacts

The WWTF discharges to the Sun River, which is classified for drinking, culinary, and food processing purposes (after conventional treatment); bathing, swimming, and recreation; growth and propagation of non-salmonid fishes and associated aquatic life, waterfowl, and furbearers; and agricultural and industrial water supply. The Sun River is used extensively for irrigation purposes, and is also a popular site for recreational fishing.

Based on Montana's 2012 list of impaired waters, the river is not supporting the aquatic life use and only partially supporting the agricultural and recreational uses. Nitrogen, phosphorus, and suspended solids are probable causes of impairments, and Sun Prairie and Vaughn WWTFs have waste load allocations for nitrogen and phosphorus from a 2005 TMDL.

3.9 Additional Impacts

None applicable.

4. Summary and Conclusions

The Sun Prairie Village County Water and Sewer District (District) wastewater treatment facility serves approximately 510 houses in the Sun Prairie CDP. The population that would be affected by an increase in wastewater fees to fund pollution control projects constitutes the entire population of the District and its 4 business contributors. As shown in a prior analysis, the costs associated with meeting the applicable numeric nutrient criteria could result in substantial adverse impacts to the community, due to the costs and baseline economic situation in the community.

The baseline economic status of this community also provides some insight into whether the impacts of pollution control expenditures would be widespread in addition to being substantial. Based on several economic indicators, the community shows signs of being economically troubled. While unemployment rates are below those of the county, state, and nation, the community's MHI has fallen below state and national medians in recent years, while the poverty rate has sharply increased. The community also has a declining population and a relatively high share of older residents who may have fixed retirement incomes.

Local expenditures on pollution control projects will yield some local benefits. For example, municipal investments in infrastructure can lead to increased economic activity. The costs associated with installing and operating new treatment systems increase demand for goods and services, which in turn increases the demand for inputs. In addition, the revenues and incomes received by local businesses and workers can increase the demand for other local goods and services, further increasing economic activities. On the other hand, increased household expenditures on wastewater fees reduce households' disposable income. The net economic effect is uncertain.

As determined in the substantial impact analysis, additional pollution controls would more than double the District's annual wastewater treatment costs, from \$167,216 currently to \$378,699 (including annualized capital and recurring operations and maintenance costs). Household wastewater costs would increase from \$323 to \$731, an increase of approximately \$34 per month. Local businesses would also face increased wastewater fees, with the non-residential share of wastewater revenues increasing from \$2,588 annually to \$5,862. Increased rates would be borne across the entire community, with every connected household and business bearing substantial increases in wastewater expenditures.

5. References

Backus, P. 2016. Clean Water: Stevensville's Wastewater Plant's Upgrade Nearly Complete. Ravalli Republic, July 13, 2016. Available at: http://ravallirepublic.com/news/local/article_d738675e-4895-11e6-b87c-cf6dc33b8857.html

City of Livingston. 2016. Wastewater Treatment Plant. Available at: http://www.livingstonmontana.org/living/wastewater_treatment_plant.html

Decker, William. 2015. Personal communication, General Manager of Sun Prairie Village County Water and Sewer District.

Flathead Beacon. 2016. Whitefish to Receive \$506,000 for Critical Infrastructure Improvements. July 26, 2016. Available at: <http://flatheadbeacon.com/2016/07/26/city-receive-506000-critical-infrastructure-improvements/>

Fraser, J. 2016. Water, Sewer Projects Likely to Continue, Increase Bills Across Montana. The Missoulian. Available at: http://missoulian.com/news/state-and-regional/water-sewer-projects-likely-to-continue-increase-bills-across-montana/article_02521482-9703-5e15-84b3-4f3b8175b61b.html

Krop, R.A., C. Hernick, and C. Frantz. 2008. Local Government Investment in Municipal Water and Sewer Infrastructure: Adding Value to the National Economy. Prepared for The U.S. Conference of Mayors, Mayors Water Council.

Rowell, J. 2016. Regulations Driving Great Falls Utility Increase. Great Falls Tribune. Available at: <http://www.greatfallstribune.com/story/news/local/2016/03/16/regulations-driving-great-falls-utility-increase/81888160/>

Rural Community Assistance Corporation. 2014. Montana Statewide Water and Wastewater Rate Survey. Final Report.

Smith, M. 2016. Wastewater Upgrades Should Benefit Butte, Environment for Decades. Montana Standard. Available at: http://mtstandard.com/news/local/wastewater-upgrades-should-benefit-butte-environment-for-decades/article_57e7ba4a-e3f9-5ef7-9945-97309656ef9e.html

Sun Prairie Village County Water and Sewer District (District). 2015. Financial Statements as of December 31, 2014.

United States Bureau of Labor Statistics (U.S. BLS). 2016a. Consumer Price Index – All Items, U.S. City Average.

United States Bureau of Labor Statistics (U.S. BLS). 2016b. Local Area Unemployment Statistics. Area: Cascade County, MT. Series ID: LAUCN300430000000003.

United States Bureau of Labor Statistics (U.S. BLS). 2016c. Local Area Unemployment Statistics. Area: Montana. Series ID: LAUST3000000000000003.

United States Bureau of Labor Statistics (U.S. BLS). 2016d. Labor Force Statistics from the Current Population Survey. Series ID: LNS14000000.

United States Census Bureau. 2016d. American Community Survey (ACS): When to Use 1-Year, 3-Year, or 5-Year Estimates. Available at: <http://www.census.gov/programs-surveys/acs/guidance/estimates.html>

United States Census Bureau. 2014a. American Community Survey (ACS) Table DP05: Demographic and Housing Estimates. 2010-2014 5-Year Estimates.

United States Census Bureau. 2014b. American Community Survey (ACS) Table DP03: Selected Economic Characteristics. 2010-2014 5-Year Estimates.

United States Census Bureau. 2014c. American Community Survey (ACS) Table S2403: Industry By Sex And Median Earnings In The Past 12 Months (In 2014 Inflation-Adjusted Dollars) For The Civilian Employed Population 16 Years And Over. 2010-2014 5-Year Estimates.

United States Census Bureau. 2014d. American Community Survey (ACS) Table S1501: Educational Attainment. 2010-2014 5-Year Estimates.

United States Census Bureau. 2013a. American Community Survey (ACS) Table DP03: Selected Economic Characteristics. 2009-2013 5-Year Estimates.

United States Census Bureau. 2013b. American Community Survey (ACS) Table DP05: Demographic and Housing Estimates. 2009-2013 5-Year Estimates.

United States Census Bureau. 2012a. American Community Survey (ACS) Table DP03: Selected Economic Characteristics. 2008-2012 5-Year Estimates.

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United States Census Bureau. 2011a. American Community Survey (ACS) Table DP03: Selected Economic Characteristics. 2007-2011 5-Year Estimates.

United States Census Bureau. 2011b. American Community Survey (ACS) Table DP05: Demographic and Housing Estimates. 2007-2011 5-Year Estimates.

United States Census Bureau. 2010a. American Community Survey (ACS) Table DP03: Selected Economic Characteristics. 2006-2010 5-Year Estimates.

United States Census Bureau. 2010b. American Community Survey (ACS) Table DP05: Demographic and Housing Estimates. 2006-2010 5-Year Estimates.

United States Environmental Protection Agency (U.S. EPA). 1995. Interim Economic Guidance for Water Quality Standards: Workbook. EPA-823-B-95-002.

6. Appendix A: Montana Widespread Impact Test

6.1 Descriptive Questions⁵

1. Geographic Area: Define the affected study area or community. This is the geographic area where direct project costs pass through to the local economy. In the case of municipal pollution control projects, the affected community is usually the immediate municipality. There are, however, exceptions where the affected community includes individuals and areas outside the immediate community. For example, if business activity of the region is concentrated in the immediate community, then outlying communities dependent upon the immediate municipality for employment, goods, and services should also be included in the Widespread analysis. Thus, the Widespread geographical area can encompass a greater area than the immediate town and/or those served by the wastewater system. It can encompass a greater area than defined in Substantial impacts.⁶

2. General Economic Trend: Describe the current general economic trend in the study area or community--qualitatively or quantitatively.

3. Industry Status and Trends: Name the main industry(s) in the study area and indicate if any major industries are intending to enter the area or leave the area. What is the current health of the main industry or of each significant industry if there is more than one? Is the boom and bust potential for the study area great?

4. Population Trend: Indicate the general population trend in the area. Is the community growing or shrinking? If the information is available, you may consider additional population trends such as whether young people are staying in the area or leaving after they graduate school.

6.2 Criteria Questions

5. General Economic Impacts: Describe how the economy in general would be affected, if at all, by having to meet the new water quality standard. Items of discussion could include any loss in population, changes in median income, the closing (or moving to another area) of one or more businesses and industries, or the impact on community and/or commercial development potential in the study area. One can use the baseline data from the Substantial tests to support this answer as well as the answers to the

⁵ Helpful resources:

- Local chamber of commerce.
- Montana Dept of Commerce's Certified Regional Development Corporations (CRDC) program. All the counties except Flathead and Richland participate in the program. For information, go to <http://businessresources.mt.gov/CRDC>.
- The Small Business Development Center (SBDC) can be found at <http://sbdc.mt.gov/>.
- The American Community Survey is conducted annually and provides long form data on an annual basis for states, counties, incorporated cities and towns, census designated places (CDPs), census tracts and block groups. For more information about the ACS, go to <https://www.census.gov/programs-surveys/acs/>.
- The number of businesses by industry, the number of employees and an estimated payroll is available through the County Business Patterns of the US Census Bureau available at <http://www.census.gov/programs-surveys/cbp.html>.
- The Montana Dept of Commerce/Census and Economic Information Center, (406) 841-2740.
- Employment by sector data is available at the state and county level, not for communities. The Montana Department of Labor and Industry publishes this data.

⁶ Here are some examples. If business activity in the region is concentrated in a nearby community and not in the immediate community, then the nearby community may also be affected by loss of income in the immediate community and should be included in the analysis. Similarly, if a large number of workers commute to an industrial facility that is significantly affected by the costs, then the affected community should include the home communities of commuters as well as the immediate community.

Descriptive questions above.

6. Employment Impacts: Will meeting the nutrient standards lead to a loss of employment due to a reduction in business activity or closure? Please give specific examples of what might happen?

7. Development Impacts: Will meeting new water quality standards have a substantial effect on residential and commercial development patterns? For example, would homes and businesses choose to locate in different areas or outside of town as a result of higher wastewater fees? In this answer, one may explore historical development patterns, financial and/or tax revenue impacts, population growth impacts, unintended impacts on water quality and any other potential consequences (good or bad).

8. Disposable Income Impacts: What would be the estimated impact, if any, on disposable income of having to meet standards? If the information is available, the applicant may describe how this change in disposable income would affect the overall economy in the area under consideration.

9. Poverty Level Impacts: What is the current poverty level in the affected area and what challenges to this value will occur as a result of the cost of compliance with water quality standards?

10. Multiplier Effects: Are there any multiplier effects from cost or benefits as a result of having to meet the new water quality standard? In other words will a dollar lost or gained as a result of the criteria result in the loss or gain of more than one dollar in the study area (e.g. direct and indirect spending)?

11. Net Debt Impacts: What would be the estimated change in overall net debt of the municipality as a result of having to meet numeric nutrient standards? Would towns closely approach or exceed their debt limits as a result of meeting water quality standards?

12. Water Quality Impacts: Would improved water quality as a result of meeting water quality standards have any widespread positive economic and/or ecological effects on the community? Would expenditures on pollution controls to reach attainment have any positive effects on the community? See the 'Benefits of Water Quality' tab for more details.

13. Additional Impacts: Is there any additional information that suggests that there are unique conditions in the affected community that should also be considered?

6.3 Summary and Conclusions

Please summarize why you believe that the costs of compliance with water quality standards creates a widespread and adverse economic impact in your community that would override the need for increased pollution control.

The main question to ask is whether widespread economic impacts are likely to occur in the study area as a result of attempting to comply with new water quality standards. The key aspect of a "widespread determination" is that it evaluates change in any socioeconomic conditions that would occur as a result of compliance (EPA 1995).

The analyst should take into account as many of the factors listed above as possible when making a decision on whether impacts are widespread. The decision should be made based on all appropriate factors in an objective manner (rather than as a checklist). The analyst will use his or her judgement on whether all the factors taken together (including some that may not be on this list) constitute widespread

impact. Likewise, applicants should not view this guidance as a check list. In all cases, socioeconomic impacts should not be evaluated incrementally; rather, their cumulative effect on the community should be assessed as a whole. Applicants should feel free to use anecdotal information to describe any current community characteristics or anticipated impacts that are not listed in the worksheet.